

AFFIDAVIT

STATE OF VA

COUNTY OF Chesterfield

Sir Edward Thomas Sr. being duly sworn according to law, deposes and attests under penalty of perjury to the following:

I, Sir Edward Thomas Sr., of the City of Richmond, State of VA, being first duly sworn on oath, state that:

1. I am over 18 years of age and competent enough to testify of my own knowledge of the facts stated herein.
2. All the facts stated by me herein are true, correct and complete to the best of my knowledge and understanding.
3. I am writing this affidavit as record of the dates of the injuries that I sustained, the grievances that I filed, and the staff at Richmond City jail and the medical department that I talked to about the care that I was receiving while at the jail. 12-17-2011 while taking a shower my legs gave out and I fell hurting my back, at pill call I told nurse Briggs and she said that she would let the medical department know when she was done her rounds. 12-18-11 I was having problems with blurry vision and numbness in my mouth, I talked to nurse Briggs again at pill call. 12-19-11 I was having problems with numbness of the mouth and problems swallowing, and was in server pain which I explained to nurse Briggs at pill call. 12-21-11 I was having problems with shallow breathing and loss of taste, which I told the short male nurse at pill call and he said that he would let medical know. 12-21-11 I talk to nurse Hardy, Ms. Jenkins and Ms. Smith about the problems that I was having the past five days since I fell, and they each said that they would let Director Williams know. 12-22-11 At morning pill call I told nurse Hardy about the issues that I was having she said that she told Director Williams, at noon pill call I also told Cpt. Cushenberry he said that he would be seeing her later and would let her know. Later that day I was called to the nursing department, and talked to Director Williams about the pain and weakness that I was having all week. Director Williams said that she would have to put in a order to the jail, to take me to MCV about the fall and for physical therapy, pain management and weight loss since I was now at 143lbs from 155lb. 12-23-11 getting out of bed my legs went numb and I collapsed, I told nurse Paul when he came at pill call. 12-24-11 I still have issues swallowing and tasting, I was pulled to nursing where they said that my blood pressure was up and my weight was now 137lbs. 12-29-11 at nurse call I told Director Williams that I was still in a lot of pain, she said that she was still waiting on the order from the jail and my weight was now 133lbs. 12-30-11 My left leg gave out while I was standing, told nurse and gave form to give to medical and I asked for batteries and patches for my Empi unit.



4. 1-3-12 Pulled to nursing to check blood pressure and weight, down to 126lbs
 Director Williams said that order still have not come in from the Sheriffs office.
 1-4-12 At Am pill call I could not move my legs, nurse Hardy said that she would
 let Director Williams know soon as she was done her rounds. 1-5-12 Server pain
 in legs and back, burning feeling in throat and chest. 1-8-12 Called to nursing to
 have weight and blood pressure checked, blood pressure was high and weight was
 123lbs. 1-15-12 I was taken to nursing to talk to them about not having most of
 my medication and have weight and blood pressure checked, pressure was up and
 weight was down to 120lbs. 1-18-12 Legs gave out in shower today, told nurse at
 pill call. 1-19-12 needle and pins feeling up and down legs. 1-20-12 I talked to
 Ms. Jenkins about meds and she said that she would talk to Director Williams,
 talked to Director Williams about legs giving out in the shower on the 18th she
 said that she would check on my meds. 1-25-12 I had visit from attorney Wendell
 Allen to talk to him about the problems that I had with the medical and jail staff.
 1-26-12 After talking to attorney about problems that I was having at the jail so
 that he could talk to the medical department, I was moved to A2L isolation cell by
 Sgt. Felix per medical when investors for the new jail was coming to talk to the
 inmates on the medical block. 1-27-12 Today I talked to nurse Drake, mental
 health classification and Lt. Johnson about issues and why I was moved. They
 said that they didn't even know that I was moved until they saw me, nurse Hardy
 said that they didn't have any of my meds. 1-31-12 No reply from the two
 grievances that was sent in, sent in 3rd request form for medical records to be sent
 to my attorney. 2-3-12 Today I sent a detailed grievance form in with nurse
 Drake. 2-10-12 I talked to the Col. when he came to the isolation cells with the
 investors for the new jail, about the grievance forms that I sent in and about being
 moved to isolation after talking to my lawyer. He said that he was not aware of
 any of this, but would get to the bottom of it and get back to me. 40 minutes later
 Director Williams came to talk to me, and said that she would be moving me back
 to A3L I gave her another request form to release my records to lawyer. 2-11-12 I
 was moved today not back to A3L but to D3L high custody block, told nurse
 Briggs that I had not had any of my meds in over a week and was in server pain.
 2-14-12 I was called to nursing department and talked to Director Williams about
 not having meds, grievance, request forms that has been sent in or being taken to
 hospital after I fell. 2-16-12 Sent grievance form with nurse Briggs about not
 having meds, batteries and patches for EMPI tens unit. 2-19-12 Today when I got
 out of bed my legs gave out, and I hit my back on the metal bed and neck and
 head on toilet. When I woke up I told nurse what happened, she said that she
 would let someone know. 2-21-12 Sent request form to nursing department to be
 taken to MCV after falling and hit my head, neck and back with nurse Briggs. 2-
 22-12 I was taken to nursing about falling, some test was done and I was told that
 a emergency visit would be put in my chart for tomorrow. 2-27-12 Taken to
 nursing to have x-ray and talk to Doctor Moja, I told him about grievances,
 request forms, falling a week ago and not being seen or given any of my meds. He
 asked Cpt. Cushenberry to pull my chart, and he said that there was no orders for
 refills in the chart. 3-3-12 Had visit from my lawyer Ms. Dorian Dalton I told her
 about all of the issues that I was having, with falling, not getting meds, or answers

to grievance or request forms. After talking to my lawyer I filed another grievance form requesting a formal meeting with, the grievance department, Sheriff C.T Woody, Col, and Dr. Moja. 3-7-12 Today I had court and the judge ordered that I be released on HEI for medical within the next two weeks to finish out estimated time of release 8-19-2013, after hearing about conditions and care that I was given in Richmond City jail.

(Printed Name of Affiant) Sir Edward Thomas Sr.

(Signature of Affiant)

(Address of Affiant) Box 70152, Richmond, VA 23255